

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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Matthew D. Guertin,

Case No. 24-cv-2646 (JRT/DLM)

Plaintiff,

vs.

Hennepin County, Keith Ellison, Mary Moriarty, Chela Guzman-Weigart, Julia Dayton-Klein, George F. Borer, Danielle C. Mercurio, Dr. Jill Rogstad, Dr. Adam Milz, Jacqueline Perez, and Bruce M. Rivers,

Defendants.

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**DECLARATION OF JAMIL  
MASROUJEH IN SUPPORT OF  
DEFENDANTS HENNEPIN COUNTY,  
MARY MORIARTY, CHELA  
GUZMAN-WEIGART, AND  
JACQUELINE PEREZ'S MOTION TO  
DISMISS**

I, Jamil Masroujeh, state and affirm as follows:

1. I am an Assistant County Attorney for Hennepin County.
2. In that capacity, I represent Defendants Hennepin County, Mary Moriarty, Chela Guzman-Weigart, and Jacqueline Perez (the “Hennepin Defendants”) in the above-entitled action.
3. Attached as Exhibit 1 is a true and correct copy of the criminal complaint in the Hennepin County District Court proceeding *State v. Guertin*, Court File No. 27-CR-23-1886 (Jan. 24, 2023).
4. Attached as Exhibit 2 is a true and correct copy of the register of actions in the Hennepin County District Court proceeding *State v. Guertin*, Court File No. 27-CR-23-1886 (Jan. 24, 2023).

5. Attached as Exhibit 3 is a true and correct copy of Judge Julia Dayton Klein's Order Denying Defendant's Motion to Represent Self Pro Se in the Hennepin County District Court proceeding *State v. Guertin*, Court File No. 27-CR-23-1886 (Jan. 24, 2023).

6. Attached as Exhibit 4 is a true and correct copy of Defendant's Motion for Judicial Notice of Indisputable Facts in the Hennepin County District Court proceeding *State v. Guertin*, Court File No. 27-CR-23-1886 (Jan. 24, 2023).

7. Attached as Exhibit 5 is a true and correct copy of the register of actions in the Hennepin County District Court proceeding *In the Matter of the Civil Commitment of Matthew David Guertin*, Court File No. 27-MH-PR-23-815 (Jul. 20, 2023).

8. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed pursuant to 28 U.S.C. § 1746 on today's date August 2, 2024.

s/ Jamil M. F. Masroujeh  
Jamil M. F. Masroujeh